

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:20-cr-00014-KJM
Plaintiff,)
vs.)
BRYAN PAUL TAMBLYN,) **STIPULATION FOR TEMPORARY
MODIFICATION OF CONDITIONS OF
PRETRIAL RELEASE; ORDER**
Defendant.) Hon. Deborah Barnes
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The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a family gathering at his mother's home in Sacramento, CA, in celebration of Independence Day. The parties have conferred with Mr. Tamblyn's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Tamblyn has been on pretrial release in this district since February 2020, on a \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

1 Mr. Tamblyn is in compliance with all of his conditions of release. One of those
2 conditions of release is location monitoring. Mr. Tamblyn is subject to curfew, and therefore
3 must remain inside his residence between the hours of 8:00 p.m. and 8:00 a.m. except for pre-
4 approved employment; education; religious services; medical, substance abuse, or mental health
5 treatment; attorney visits; court appearances; court ordered obligations; or other activities
6 authorized by the pretrial services officer¹.

7 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
8 Release be temporarily amended to specifically permit him to attend a family gathering at his
9 mother's home in Sacramento, CA. Mr. Tamblyn's mother is hosting a gathering of family
10 members to celebrate Independence Day that is expected to conclude at 11:00 p.m. on Monday,
11 July 4, 2022. The guests will include Mr. Tamblyn's parents, siblings, nieces and nephews. Any
12 minors in attendance will be accompanied by their parents, whose names and contact information
13 have been provided to the pretrial services officer.

14 Mr. Tamblyn's mother's home is (approximately) a 35-minute drive from Mr. Tamblyn's
15 residence in Elk Grove, CA. Allowing some additional time for traffic and some time set aside
16 to help with clean-up, the parties request a temporary modification of pretrial conditions to
17 permit Mr. Tamblyn to return home by midnight (11:59 p.m.) on Monday, July 4, 2022. Mr.
18 Tamblyn will be in the company of at least one third party custodian and multiple sureties at his
19 mother's home. Mr. Tamblyn will return directly to his residence at the conclusion of the
20 gathering.

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27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 essential, with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the
form of a stipulation by the parties.

1 The proposed temporarily amended condition is attached to this request. The parties do not
2 request a hearing in this matter in light of this stipulation.

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4 Respectfully submitted,

5 DATED: June 30, 2022
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HEATHER E. WILLIAMS

Federal Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for BRYAN PAUL TAMBLYN

DATED: June 30, 2022
PHILLIP A. TALBERT

United States Attorney

/s/ Christina McCall
CHRISTINA MCCALL
Assistant United States Attorney
Attorney for the United States

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to attend a family gathering in celebration of Independence Day at his mother's home in Sacramento, CA and return to his residence no later than 11:59 p.m. on Monday, July 4, 2022. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: June 30, 2022



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE